

# **EXHIBIT A**

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**From:** Mike Sherry <michaelsherry@churchmilitant.com>  
**Sent:** Tuesday, December 26, 2023 9:06 PM  
**To:** Cooper, Howard; M Voris  
**Cc:** frdelaire@aol.com; Cacace, Joseph; Suzanne Elovecky; Georgakopoulos, Maria  
**Subject:** [EXTERNAL] Re: de Laire/Church Militant

Hi Mr. Cooper,

Yes, I have received this draft. Thank you!

Because St. Michael's Media does not have legal counsel currently and the judge would like me to be careful in my decisions, I would like the opportunity to show this stipulation to another lawyer.

I'm not as good with these legal documents and want to make sure everything is handled properly.

I would be reviewing this him tomorrow morning (8am - 12pm) and will give you an immediate answer.

Also, found out the closing on the buildings are on 29-January (this Friday, not 28-January (Thursday) as originally thought)

God bless,  
Mike Sherry

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**From:** Cooper, Howard <hcooper@toddweld.com>  
**Sent:** Tuesday, December 26, 2023 6:46 PM  
**To:** Mike Sherry <michaelsherry@churchmilitant.com>; M Voris <IrishRebel1983@outlook.com>  
**Cc:** frdelaire@aol.com <frdelaire@aol.com>; Cacace, Joseph <jcacace@toddweld.com>; selovecky@psh.com <selovecky@psh.com>; Georgakopoulos, Maria <mgeorgakopoulos@toddweld.com>  
**Subject:** Re: de Laire/Church Militant

Mr. Sherry- please confirm your receipt of the proposed stipulation.

Given the timing, if I don't hear from you by first thing in the morning, I will submit what I sent you as an unagreed proposed order from plaintiff's side, although I would much prefer to do this cooperatively.

Thank you.

Howard

Howard M. Cooper

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On Dec 26, 2023, at 4:22 PM, Cooper, Howard <hcooper@toddweld.com> wrote:

Dear Mr. Sherry –

In accordance with the Court's instructions today, I attach a draft proposed stipulation to be filed with the Court. Please let me know as soon as possible if you have any comments. If the stipulation is acceptable in its current form, please sign it and send it back to me and we will take care of the filing.

Thank you,

Howard Cooper

<Stipulation of Parties.docx>

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

VERY REVEREND GEORGES F. de  
LAIRE, J.C.L.,

Plaintiff,

v.

GARY MICHAEL VORIS, ANITA CAREY,  
ST. MICHAEL'S MEDIA a/k/a CHURCH  
MILITANT, and MARC BALESTRIERI

Defendants.

CIVIL ACTION NO. 1:21-cv-00131-JL

**STIPULATION OF THE PLAINTIFF FATHER DE LAIRE AND THE DEFENDANT  
ST. MICHAEL'S MEDIA A/K/A CHURCH MILITANT**

After a hearing held in this matter on December 26, 2023, the parties, plaintiff Father Georges de Laire ("Fr. de Laire"), and the defendant, St. Michael's Media a/k/a Church Militant ("Church Militant"), hereby stipulate and agree as follows:

1. Church Militant shall escrow in a designated bank escrow account ("the Escrow Account"), and with proof to Fr. de Laire, all of the net proceeds from the closing of the upcoming sale of its' properties located at 2900 Hilton Road and 2840 Hilton Road, Ferndale, Michigan as prejudgment security in this case.
2. Church Militant, at its earliest opportunity, but no later than five (5) business days from the date of this order, shall file with the Court an affidavit

attesting to its' monthly operating expenses as to which it seeks to have the Court permit payment from the Escrow Account. Church Militant shall provide the affidavit to counsel for Father de Laire. Within three (3) business days, Fr. de Laire shall file any objections he may have to the payment from the Escrow Account of the proposed operating expenses.

3. The Court shall schedule a further hearing on the matter after Church Militant has retained new counsel. In the interim, the Court takes no action of Fr. de Laire's Motion to Attach with Notice [Docket No. 202].
4. The parties request that this Stipulation be entered as an order of the Court and that the order remain in effect until further order of the Court.

Respectfully submitted,

THE VERY REVEREND GEORGES F. DE LAIRE,

By His Attorneys,

/s/ Joseph M. Cacace

Joseph M. Cacace, N.H. Bar No. 266082

Howard M. Cooper, *pro hac vice*

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/s/ Suzanne M. Elovecky

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ST. MICHAEL'S MEDIA A/K/A  
CHURCH MILITANT,

By its authorized representative,

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Michael Sherry, Member of the Board

SO ORDERED THIS \_\_ DAY OF DECEMBER 2023.

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The Honorable Judge Joseph N. Laplante  
USDC NH

Dated: December \_\_, 2023.